

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

SECURITIES AND EXCHANGE	§	
COMMISSION,	§	
	§	
Plaintiff,	§	
	§	Civil Action # 3:08-cv-01687-M
v.	§	
	§	
Ryan M. Reynolds,	§	
Desmond J. Milligan,	§	
Jason W. Brola,	§	
Timothy T. Page,	§	
Market 99, Ltd., formerly known as	§	
Ecarfly, Inc.,	§	
Tryst Capital Group, L.L.C.,	§	
Griffdom Enterprises, Inc.,	§	
Testre, L.P., and	§	
Bellatalia, L.P.	§	
Defendants.	§	

**SECOND UNOPPOSED MOTION TO AMEND JOINT REPORT  
REGARDING PROPOSED SCHEDULING ORDER [Doc #28]**

TO THE UNITED STATES DISTRICT JUDGE OF SAID COURT:

Defendants Bellatalia, L.P. and Ryan M. Reynolds (collectively “the Reynolds defendants”) submit this second unopposed motion to amend the Joint Report Regarding Proposed Scheduling Order [Doc #28]. Counsel for the Reynolds defendants makes this request after conferring with the attorneys for plaintiff, Securities and Exchange Commission, and the attorney for defendants Timothy T. Page and Testre, L.P., (being all of the defendants who have filed an answer in this

matter), as well as the Assistant United States Attorney for the Northern District of Texas, and after determining that all such parties are in agreement.

On March 11, 2009 the Court entered an electronic order [Doc #35] modifying the Joint Report Regarding Proposed Scheduling Order by permitting the parties to exchange initial Fed. R. of Civ. P. 26(a)(1) disclosures on or before March 24, 2009. The Reynolds defendants have been informed by the U.S. Attorney's Office that it is preparing and will be seeking a stay of discovery in this case. In anticipation of such, the parties agree that it will be best to again modify the Joint Report Regarding Proposed Scheduling Order to postpone the Fed. R. of Civ. P. 26(a)(1) disclosures until April 15, 2009 and pray that this Court order same.

Respectfully submitted this 24th day of March, 2009.

/s/ David A. Carp

David A. Carp  
Herzog & Carp  
TBN: 03836500  
P. O. Box 218845  
Houston, Texas 77218-8845  
713.781.7500 Phone  
713.781.4797 Fax

Attorneys for Defendants  
Ryan M. Reynolds and Bellatalia, L.P.

### CERTIFICATE OF SERVICE

This is to certify that on March 24, 2009, I electronically filed the foregoing Second Unopposed Motion to Amend Joint Report Regarding Proposed Scheduling Order with the clerk of court for the U. S. District Court, for the Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the following attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means:

Leslie J. Hughes, Esq.  
John B. Smith, Esq.  
Denver Regional Office  
1801 California Street, Suite 1500  
Denver, CO 80202-2656  
[HughesLJ@sec.gov](mailto:HughesLJ@sec.gov)  
[SmithJB@sec.gov](mailto:SmithJB@sec.gov)

Attorneys for the United States  
Securities and Exchange  
Commission

John Courtade, Esq.  
John Courtade, P.C.  
4408 Spicewood Springs Road  
Austin, TX 78759  
[johncourtade@johncourtade.com](mailto:johncourtade@johncourtade.com)

/s/ David A. Carp